CHECKLIST ENVIRONMENTAL ASSESSMENT

Proposed Action: Approve Drilling Permit (Form 22)

Project/Well Name: Water Hole #1 **Operator:** Prima Exploration, Inc.

Location: SW SE Section 24 T25N R58E

County: Richland MT; Field (or Wildcat): Wildcat

Proposed Project Date: 10/01/2021

I. DESCRIPTION OF ACTION

Prima Exploration, Inc. plans to drill a saltwater disposal well in the Dakota Formation 5,984' TVD/MD. Surface casing to be set at 2,200'.

II. PROJECT DEVELOPMENT

1. PUBLIC INVOLVEMENT, AGENCIES, GROUPS, OR INDIVIDUALS CONTACTED

Montana Bureau of Mines and Geology, GWIC website (Richland County Wells).

US Fish and Wildlife, Region 6 website ENDANGERED, THREATENED, PROPOSED AND CANDIDATE SPECIES MONTANA COUNTIES, Richland County

Montana Natural Heritage Program Website (FWP) Heritage State Rank= S1, S2, S3, T25N R58E

Montana Cadastral Website

Surface Ownership and surface use Section 24 T25N R58E

Montana Department of Natural Resources MEPA Submittal

2. ALTERNATIVES CONSIDERED

No Action Alternative: The proposed well would not be drilled.

Action Alternative: Prima Exploration, Inc. would have permission to drill the well.

III. IMPACTS ON THE PHYSICAL ENVIRONMENT

3. AIR QUALITY

Long drilling time: 5-7 days drilling time.

Unusually deep drilling (high horsepower rig): Triple derrick drilling rig to drill a saltwater disposal well, 5,984' TVD/MD.

Possible H2S gas production: No H2S anticipated.

In/near Class I air quality area: No Class I air quality area nearby.

Air quality permit for flaring/venting (if productive): Yes, DEQ air quality permit required under 75-2-211. AQB review.

Comments: No special concerns – using triple derrick rig to drill to 5,984' TVD/MD. If there are no gas gathering systems nearby, associated gas can be flared under Board Rule 36.22.1220.

4. WATER QUALITY

Salt/oil based mud: Yes, will drill with oil based invert drilling fluids for the intermediate casing hole. Horizontal hole will be drilled with saltwater. Surface casing hole will be drilled with freshwater and freshwater mud system, Rule 36.22.1001.

High water table: No high-water table anticipated at this surface location.

Surface drainage leads to live water: No, the closest drainage is an unnamed ephemeral drainage about 3/10 of a mile to the east from this drilling location and leads to Fourmile Creek.

Water well contamination: None, surface hole will be drilled with freshwater and freshwater drilling fluids to 2,200', steel surface casing will be run and cemented to surface from 2,200' to protect any ground and surface waters. Closest water well from this location are two stockwater wells 7/10 of a mile to the northeast and are 110' and 195' deep. Several monitor wells are listed about 1/2 a mile to the west and range from 15' - 20' deep. Two industrial wells are listed as about ½ mile to the west and are 350' and 300' deep. Two commercial wells are listed as ½ a mile to the west and are 365' and 350' deep.

Porous/permeable soils: No, sandy silty clay soils.

Class I stream drainage: Closest Class I stream drainage is the Missouri River, about 7.8 miles to the northeast from this location.

Groundwater vulnerability area: NA.

Mitigation:

- Lined reserve pit
- _X_Adequate surface casing
- Berms/dykes, re-routed drainage
- X Closed mud system
- _X_ Off-site disposal of **solids**/liquids (in approved facility)
- Other:

Comments: Steel surface casing will be run to 2,200' and cemented to surface to protect ground water. (Rule 36.22.1001).

5. SOILS/VEGETATION/LAND USE

Vegetation: Spring wheat.

Steam crossings: No stream crossings anticipated. Crossing only ephemeral drainages over existing county roads.

High erosion potential: Low erosion potential on moderate cut and small fill slopes, a cut of up to 12.2' and a fill of up to 6.5', required.

Loss of soil productivity: Slight, unused portion of this drillsite will be reclaimed.

Unusually large wellsite (Describe dimensions): A large well site 600' X 475' to accommodate five wells.

Damage to improvements: Slight surface use appears to for grazing.

Conflict with existing land use/values: Slight.

Mitigation

- __ Avoid improvements (topographic tolerance)
- __ Exception location requested
- X Stockpile topsoil
- __ Stream Crossing Permit (other agency review)
- X Reclaim unused part of wellsite if productive
- Special construction methods to enhance reclamation

Access Road: Access will be over existing county road, #350. A new access of 524' will be built into location.

Drilling fluids/solids: A closed loop system will be used for this well. The cuttings will be hauled to a commercial disposal site and disposed.

6. HEALTH HAZARDS/NOISE

Proximity to public facilities/residences: No residences within ¼ a mile.

Possibility of H2S: No H2S anticipated.

Size of rig/length of drilling time: Triple derrick rig. 5-7 days drilling time.

Mitigation:

X Proper BOP equipment (Adequate surface casing cemented to surface, Rule 36.22.1001, with working BOP stack should mitigate any problems, (5,000 psig annular and double ram), Rule 36.22.1014.)

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- __ H2S contingency and/or evacuation plan
- ___ Special equipment/procedures requirements
- __ Other:

7. WILDLIFE/RECREATION

Sage Grouse: NA

Proximity to sensitive wildlife areas (DFWP identified): None identified.

Proximity to recreation sites: None identified. Creation of new access to wildlife habitat: No.

Conflict with game range/refuge management: No.

Threatened or endangered Species: Species identified as threatened or endangered are the Pallid Sturgeon, Interior Least Tern, Whooping Crane, Piping Plover, and the Northern Long-eared Bat. The Montana Natural Heritage Program lists three (3) species of concern: Whooping Crane, Northern Redbelly Dace, Iowa Darter.

Mitigation: Avoidance (topographic tolerance/exception) Other agency review (DFWP, federal agencies, DNRC Trust Lands) Screening/fencing of pits, drillsite Other: Comments: Private grazing surface lands. There may be species of concern that maybe impacted by this wellsite. We ask the operator to consult with the surface owner as to what he would like done, if a species of concern is discovered at this location. The Board of Oil & Gas has no jurisdiction over private surface lands. No concerns.					
IV. IMPACTS ON THE HUMAN POPULATION					
8. HISTORICAL/CULTURAL/PALEONTOLOGICAL					
Proximity to known sites: None identified. Mitigation avoidance (topographic tolerance, location exception) other agency review (SHPO, DNRC Trust Lands, federal agencies) Other:					
9. SOCIAL/ECONOMIC					
Substantial effect on tax base Create demand for new governmental services Population increase or relocation Comments: No concerns.					

IV. SUMMARY

No long term impacts expected. Some short term impacts will occur, but can be mitigated. I conclude that the approval of the subject Notice of Intent to Drill (does/ $\underline{\text{does not}}$) constitute a major action of state government significantly affecting the quality of the human environment, and (does/ $\underline{\text{does}}$ $\underline{\text{not}}$) require the preparation of an environmental impact statement.

EA Checklist	Name:	John Gizicki	Date:	05/10/21
Prepared By:	Title:	Compliance Specialist		